

IN THE SUPREME COURT OF FLORIDA

Case No. SC2025-1325

In re: Petition for All Writs Relief Under Article V, § 3(b)(8), Florida
Constitution

Petitioner: Mario Mirabal

NOTICE OF DEPRIVATION OF RIGHTS AND REQUEST FOR
IMMEDIATE STAY

COMES NOW Petitioner, Mario Mirabal, pro se, and respectfully provides this Notice of Deprivation of Rights and Request for Immediate Stay in the above-captioned proceeding. This notice is submitted not as an amendment or supplement to the pending writ, but as an urgent alert to this Court that new actions have occurred in the lower tribunal that threaten irreparable harm to Petitioner and undermine the jurisdiction of this Court while the writ remains pending.

I. PROCEDURAL AMBUSH AND RETALIATORY HEARING SET FOR
OCTOBER 7, 2025

Petitioner filed a Writ of Prohibition and Emergency Stay with this Court on

or about September 17, 2025, which remains pending as of this date. That writ placed Respondent Judge Lourdes Simon on notice of serious jurisdictional and constitutional violations in Case No. 2024-022769-CA-01, including formal objections to a hearing previously scheduled for October 14, 2025.

However, on or about October 3, 2025, the lower tribunal suddenly scheduled a second hearing for October 7, 2025, titled a “Rule to Show Cause,” without motion, notice, or procedural justification, and with no prior docket listing. This hearing was set after Petitioner had already filed constitutional objections and notified both the lower tribunal and this Court of ongoing federal proceedings and jurisdictional conflict.

This newly scheduled hearing creates the appearance of retaliatory judicial action, designed to circumvent federal and appellate review and to impose punitive measures against the Petitioner while his constitutional claims remain under active review by this Court.

II. ONGOING CONSTITUTIONAL VIOLATIONS

The October 7 hearing threatens immediate deprivation of fundamental rights, including:

Denial of due process,

Retaliation for protected filings,

Interference with parallel federal court proceedings,

And irreparable injury to Petitioner through potential contempt, sanctions, or ejection — before this Court can rule on the validity of the lower tribunal’s jurisdiction.

These actions represent an active subversion of this Court’s authority and deprive Petitioner of meaningful access to Florida’s highest court for protection.

II-A. CANCELLATION OF OCTOBER 7 HEARING DOES NOT MOOT THIS NOTICE

Following the preparation of this Notice, Petitioner received 9:24 AM October 6, 2025 an automated cancellation notice for the October 7, 2025 “Rule to Show Cause” hearing in the lower tribunal. The docket reflects a cancellation reason of “Pending order on,” but no order has been entered or served on Petitioner to explain the basis or future course of action.

Petitioner respectfully submits that this cancellation does not resolve the underlying threat. The October 14, 2025 hearing remains active, and is based on a motion seeking to declare Petitioner a “vexatious litigant” — part of an ongoing pattern of retribution that began following Petitioner’s exposure of systemic fraud under color of law.

The cancellation of one hearing, without explanation or remedial order, does not cure the constitutional violations already at issue in the pending writ, and the Court’s supervisory intervention remains urgently required.

III. REQUEST FOR RELIEF

Petitioner respectfully requests that this Court:

Take judicial notice of the newly scheduled October 7, 2025 hearing in Case No. 2024-022769-CA-01;

Immediately stay all proceedings in the lower tribunal related to that case, including the October 14 hearing and any further action by Judge Simon, pending resolution of the writ;

Grant any other relief this Court deems necessary to protect Petitioner's constitutional rights, prevent judicial retaliation, and preserve the integrity of this Court's appellate jurisdiction.

IV. EXHIBITS AND DOCUMENTARY EVIDENCE

The following exhibits are attached in support of this Notice:

Exhibit List

Exhibit A

Title: Miami-Dade Clerk Docket Extract – As of October 6, 2025 (Post-Deletion Version)

Description:

This version of the official docket was printed on October 6, 2025, after the previously scheduled October 7, 2025 hearing was cancelled and removed. The entry is no longer visible on the online docket. This exhibit confirms the current, altered state of the court record following the hearing's deletion.

Exhibit B

Title: Prior Clerk Docket Extract (Verbatim Copy, October 5, 2025) –
Includes October 7 Hearing

Description:

This docket extract was copied by the undersigned directly from the Miami-Dade Clerk of Courts online system on or about October 5, 2025, prior to the deletion of the October 7 hearing. It includes the scheduled “Rule to Show Cause” hearing set for October 7, 2025, and serves as proof that the hearing was publicly listed before being removed. This copy is provided under penalty of perjury as a truthful reproduction of a publicly accessible court record.

Exhibit C

Title: October 3, 2025 – Zoom Hearing Notification: Rule to Show Cause

Description:

An official court-generated Zoom meeting invitation confirming that the “Rule to Show Cause” hearing was calendared and scheduled for October 7, 2025. This notice further confirms the procedural setup for the hearing that was later cancelled and deleted from the docket.

Exhibit D

Title: October 6, 2025 – Notice of Cancelled Court Event (Rule to Show

Cause)

Description:

An email from cmap-noreply@jud11.flcourts.org

confirming the cancellation of the October 7, 2025 hearing. The cancellation reason is listed only as “Pending order on.” No formal order or explanation has been provided as of the time of this filing.

Respectfully submitted,

/s/ Mario Mirabal

Mario Mirabal, Pro Se

563 W. 49th Street

Miami Beach, FL 33140

Email: solphax@gmail.com

October 6, 2025

EXHIBIT A

Case Information

Local Case Number:

2024-022769-CA-01

State Case Number:

132024CA02276901GE01

Case Style:

KP INVESTMENTS MIAMI, LLC a
Florida LLC vs Mario Mirabal

Filing Date:

11/27/2024

Judicial Section:

CA02 - Downtown Miami - Judge
Simon, Lourdes

Case Status:

OPEN

Case Type:

Equitable Relief

Consolidated Case No.:

Related Cases

No data available

Hearing Details

Hearing Date:

11/07/2025

Description:

Calendar Call

Hearing Time:

1:00PM

Hearing Location:

Hearing Code:

CALND

Hearing Date:

10/14/2025

Description:

Motion Calendar

Hearing Time:

9:30AM

Hearing Location:

Hearing Code:

MOTCAL

Hearing Date:

08/28/2025

Description:

Motion Calendar

Hearing Time:

9:00AM

Hearing Location:

Hearing Code:

MOTCAL

Hearing Date:

06/18/2025

Description:

Motion Calendar

Hearing Time:

11:15AM

Hearing Location:

Hearing Code:

MOTCAL

Hearing Date:

03/27/2025

Description:

Motion Calendar

Hearing Time:

9:30AM

Hearing Location:

Hearing Code:

MOTCAL

Hearing Date:

03/11/2025

Description:

Motion Calendar

Hearing Time:

9:30AM

Hearing Location:

Hearing Code:

MOTCAL

Hearing Date:

02/03/2025

Hearing Time:

11:00AM

Hearing Code:

MOTCAL

Parties

Party Description	Party Name	Attorney Information	Other Attorney(s)
Plaintiff	KP INVESTMENTS MIAMI, LLC a Florida LLC	B#: 101733 Cunill, John M	
Defendant	Mirabal, Mario		

Dockets

DIN	Date	Book/Page	Docket Entry	Event Type	Comments
	11/07/2025		Calendar Call	Hearing	
	10/14/2025		Motion Calendar	Hearing	PLAINTIFF S MOTION TO DECLARE DEFENDANT, MARIO MIRABAL A VEXATIOUS LITIGANT AND REQUEST FOR SECURITY BOND
94	09/17/2025		Emergency Motion	Event	TO STAY PROCEEDINGS, STRIKE CONFLICTED COUNSEL, AND RECOGNIZE FEDERAL DIVESTITURE
92	09/15/2025		Notice of Hearing-	Event	October 14, 2025
93	09/10/2025		Motion to Strike	Event	
91	09/10/2025		Motion:	Event	Plaintiff's
90	09/09/2025		Notice:	Event	(Emergency) Judicial Notice of Pending Motion to Disqualify, Notice of Federal Conflict, and Objection to Rule to Show Cause Hearing scheduled for October 7, 2025
89	09/09/2025		Emergency Motion	Event	TO DISQUALIFY JOHN CUNILL AND THE LAW OFFICES OF ADORNO & CUNILL
88	09/05/2025		Emergency Motion	Event	TO STAY SANCTIONS ORDER AND TO PRESERVE DEFENSIVE FILINGS PENDING FEDERAL AND CONSTITUTIONAL REVIEW
87	09/05/2025		Objection:	Event	TO ORDER ENTERED AFTER DIVESTITURE AND DISQUALIFICATION, AND NOTICE OF PENDING SUPREME COURT AND FEDERAL OVERSIGHT
86	09/04/2025		Order Granting Sanctions	Event	
84	09/04/2025		Response to Motion	Event	
85	09/03/2025		Notice of Filing:	Event	SUPREME COURT OF FLORIDA ACKNOWLEDGMENT OF NEW CASE
83	09/02/2025		Response to Motion	Event	IN OPPOSITION TO DEFENDANT'S MOTION TO VACATE AND NOTICE OF UNLICENSED PRACTICE OF LAW.
82	09/02/2025		Notice:	Event	OF ESCALATION TO SUPERVISORY AUTHORITIES AND RENEWED DEMAND FOR STAY PENDING FEDERAL AND STATE REVIEW
81	09/01/2025		Notice of Unavailability/absence	Event	
80	09/01/2025		Emergency Motion	Event	TO VACATE AND STRIKE VOID ORDERS ENTERED BY DISQUALIFIED JUDGE AND IMPROPER DENIAL OF RECUSAL
79	08/29/2025		Order:	Event	ON DEFENDANT'S MOTION TO DISQUALIFY
77	08/29/2025		Motion to Disqualify	Event	
78	08/28/2025		Notice of Taking Deposition	Event	
	08/28/2025		Motion Calendar	Hearing	PLAINTIFF S MOTION FOR SANCTIONS PURSUANT TO FLA. R. CIV. P. 1.380
76	08/26/2025		Notice:	Event	Non-appearance
75	08/26/2025		Order:	Event	PROPOSED- DEFENDANT'S MOTION IS DENIED
74	08/20/2025		Notice:	Event	OF LACK OF JURISDICTION AND MOTION TO STAY/ABATE
73	08/19/2025		Notice of Hearing-	Event	August 28, 2025, at 9:00 a.m.

DIN	Date	Book/Page	Docket Entry	Event Type	Comments
71	07/31/2025		Order:	Event	DENYING MOTION TO DEEM DISQUALIFICATION GRANTED AND REQUEST FOR STAY
70	07/30/2025		Order Denying Judicial Disqualification	Event	
69	07/23/2025		Motion for Sanctions	Event	
68	07/22/2025		Notice:	Event	of Deemed Grant of Disqualification and Request for Stay Pending Federal and Related Proceedings
72	07/18/2025		Reassignment Pursuant to Administrative Order	Event	AO number): AO 25-06
67	06/23/2025		Notice of Taking Deposition	Event	
66	06/22/2025		Request for Hearing	Event	
65	06/18/2025		Order on Motion to Compel	Event	
	06/18/2025		Motion Calendar	Hearing	
64	06/17/2025		Request for Hearing	Event	
63	06/04/2025		Request for Hearing	Event	
62	05/28/2025		Amended Notice of Hearing	Event	6-18-2025
61	05/28/2025		Notice of Hearing-	Event	June 18, 2025, at 11:15 a.m., via Zoom
60	05/28/2025		Motion to Compel	Event	
59	05/28/2025		Affidavit in Support of Motion for Judgment	Event	
58	05/28/2025		Request for Hearing	Event	
57	05/27/2025		Notice of Taking Deposition	Event	6-10-2025
56	05/26/2025		Request for Hearing	Event	
55	05/25/2025		Request for Hearing	Event	Defendant's
54	05/25/2025		Emergency Motion	Event	to Strike Plaintiffs Second Motion for Summary Judgment and to Stay All Proceedings Pending Federal Review of Rule 60(d)(3) Fraud and Sealed Matters and Motion for Hearing
53	05/23/2025		Motion for Summary Judgment	Event	
52	05/23/2025		Notice:	Event	OF FEDERAL FRAUD-BASED MOTION UNDER REVIEW IN ELEVENTH CIRCUIT UNDER RULE 60(D)(3) FRAUD UPON THE COURT
51	05/21/2025		Exhibit List	Event	
50	05/21/2025		Witness List	Event	
49	05/14/2025		Notice:	Event	of Interference with pending Federal Appellate Jurisdiction and Request for Deferred Action
48	05/11/2025		Notice:	Event	OF JURSDICTIONAL CONFLICT
47	05/08/2025		Order:	Event	3RD DCA ORDER ETC.,
46	03/31/2025		Request for Hearing	Event	ON SEALED MOTION AND RELATED FILINGS
45	03/29/2025		Letter of Correspondence	Event	from Mario Mirabal
44	03/28/2025		Notice:	Event	OF FEDERAL APPEAL TO THE ELEVENTH CIRCUIT COURT OF APPEALS (Case No. 25-10862
43	03/27/2025		Motion:	Event	TO RECALL OR QUASH ANY WRIT OF POSSESSION PENDING APPEAL
42	03/27/2025		Notice:	Event	OF STAY PENDING APPEAL
41	03/27/2025		Notice:	Event	OF FEDERAL PROCEEDINGS AND REQUEST FOR JUDICIAL AWARENESS
39	03/27/2025	34684/4180	Notice of Appeal	Event	FILED AT THE 3RD DCA

DIN	Date	Book/Page	Docket Entry	Event Type	Comments
	03/27/2025		Motion Calendar	Hearing	Motion For Default Judgment
38	03/26/2025		Notice of Filing:	Event	AND DELIVERY CONFIRMATION REGARDING UNDOCKETED MOTION
37	03/26/2025		Response to Motion	Event	TO STAY
36	03/24/2025		Notice:	Event	OF RECORD OF ORAL STATEMENT MADE DURING HEARING ON 03-11-2025
35	03/24/2025		Motion for Sanctions	Event	
40	03/21/2025		Response to Motion	Event	
32	03/19/2025		Notice:	Event	OF APPELLATE JURISDICTION AND REQUEST TO DEFER FURTHER ACTION
31	03/19/2025		Emergency Motion	Event	TO STAY MARCH 27, 2025 HEARING AND ALL PROCEEDINGS PENDING APPELLATE REVIEW
34	03/18/2025		Notice of Hearing-	Event	March 27, at 9:30 a.m.
33	03/18/2025		Motion for Default Judgment	Event	
30	03/13/2025		Emergency Motion	Event	For Stay Pending Appeal
29	03/12/2025		Order Denying Motion to Dismiss	Event	
	03/11/2025		Motion Calendar	Hearing	Mirabal's mtn to dismiss
28	03/06/2025		Notice of Filing:	Event	ORDER OF REMAND
25	03/06/2025		Motion:	Event	To Alert the Court of Clerical Error
27	03/04/2025		Notice of Hearing-	Event	March 11, at 9:30 a.m.
26	03/04/2025		Motion to Strike	Event	
24	03/04/2025		Notice of Filing:	Event	Order of Remand United States District Court Southern District of Florida
23	03/03/2025		Emergency Motion	Event	For Stay Pending Emergency Administrative Review, etc,...
22	02/18/2025		Notice of Filing:	Event	Notice of Removal
21	02/10/2025		Motion to Dismiss	Event	
20	02/03/2025		Order Setting Non-Jury Trial with Mediation Referral	Event	Call of the Calendar on 11-07-2025 at 1pm
19	02/03/2025		Order Denying Motion	Event	TO CONSOLIDATE
	02/03/2025		Motion Calendar	Hearing	Motion to Consolidate
18	01/27/2025		Order Setting CM Deadline	Event	
17	01/02/2025		Motion:	Event	TO ALERT THE COURT OF FRAUD, MATERIAL OMISSION, AND REQUEST FOR JUDICIAL COORDINATION AND RELIEF
16	12/11/2024		Response:	Event	AND OBJECTION TO DEFENDANT'S MOTION TO CONSOLIDATE
15	12/11/2024		Notice of Hearing-	Event	02-03-2025 @ 11:00 AM
14	12/11/2024		Response to Motion	Event	
13	12/05/2024		Motion:	Event	To Request Consolodation or Trfansfer to Judge Tanya Brinkley
12	12/03/2024		Electronic Summons Email Notification Sent	Event	John Cunill
11	12/03/2024		Electronic Summons Email Notification Sent	Event	John Cunill
	12/03/2024		20 Day Summons Issued	Service	
10	12/03/2024		ESummons 20 Day Issued	Event	Re: Index # 6.
	12/03/2024		20 Day Summons Issued	Service	
9	12/03/2024		ESummons 20 Day Issued	Event	Re: Index # 5.

DIN	Date	Book/Page	Docket Entry	Event Type	Comments
8	12/03/2024		Receipt:	Event	Receipt#:3190162 Amt Paid:\$10.00 Name:CUNILL, JOHN M 1000 BRICKELL AVE STE 1100 MIAMI FL 33131-3014 Comment: Allocation Code Quantity Unit Amount 3139-Summons Issue Fee 1 \$10.00 \$10.00 Tender Type:eFilings Tender Amt:\$10.00 Receipt Date:12/03/2024 Register#:319 Cashier:EFilingUser
7	12/03/2024		Receipt:	Event	Receipt#:3190160 Amt Paid:\$10.00 Name:CUNILL, JOHN M 1000 BRICKELL AVE STE 1100 MIAMI FL 33131-3014 Comment: Allocation Code Quantity Unit Amount 3139-Summons Issue Fee 1 \$10.00 \$10.00 Tender Type:eFilings Tender Amt:\$10.00 Receipt Date:12/03/2024 Register#:319 Cashier:EFilingUser
6	11/29/2024		(M) 20 Day (P) Summons (Sub) Received	Event	
5	11/29/2024		(M) 20 Day (P) Summons (Sub) Received	Event	
4	11/29/2024		Receipt:	Event	Receipt#:2110041 Amt Paid:\$401.00 Name:CUNILL, JOHN M 1000 BRICKELL AVE STE 1100 MIAMI FL 33131-3014 Comment: Allocation Code Quantity Unit Amount 3100-Circuit Filing Fee 1 \$401.00 \$401.00 Tender Type:eFilings Tender Amt:\$401.00 Receipt Date:11/29/2024 Register#:211 Cashier:EFilingUser
2	11/27/2024		Complaint	Event	
1	11/27/2024		Civil Cover Sheet - Claim Amount	Event	

EXHIBIT B

Clerk of the Courts - Miami-Dade County, Florida Juan Fernandez-Barquin,
Esq. Clerk of the Court and Comptroller of Miami-Dade County
Register/Login Contact Us Shopping cart Clerk Home OCS Home Case List
Case Information Case Information Print Case Info Search Criteria Party
Name: kp investments Party Type: Filing Date From: Filing Date To: Section:
Case Type: Second Party Name: Not all search results will be displayed
online. For example, the following case types (Sealed, Juvenile, Adoption,
and Mental Health Cases) may or may not be in existence, and may or may
not be viewable by the public pursuant to the Florida Supreme Court
Mandate and the corresponding Access Security Matrix. Case Details KP
INVESTMENTS MIAMI, LLC a Florida LLC vs Mario Mirabal Local Case
Number:2024-022769-CA-01 Filing Date:11/27/2024 State Case
Number :132024CA02276901GE01 Judicial Section :CA02 - Downtown
Miami - Judge Simon, Lourdes Consolidated Case No. :N/A Court
Location :2024-022769-CA-01 Case Status :OPEN Case Type :Equitable
Relief Related Cases 0 results returned Hearing Details 8 results returned
Table View Select sorting type Select a filter type Hearing Date Hearing
Time Hearing Code Description Hearing Location 11/07/2025 1:00PM
CALND Calendar Call 10/14/2025 9:30AM MOTCAL Motion Calendar
10/07/2025 9:30AM MOTCAL Motion Calendar 08/28/2025 9:00AM
MOTCAL Motion Calendar 06/18/2025 11:15AM MOTCAL Motion Calendar
03/27/2025 9:30AM MOTCAL Motion Calendar 03/11/2025 9:30AM
MOTCAL Motion Calendar 02/03/2025 11:00AM MOTCAL Motion Calendar
Parties 2 results returned Table View Select sorting type Select a filter type
Party Description Party Name Attorney Information Other Attorney(S)
Plaintiff KP INVESTMENTS MIAMI, LLC a Florida LLC B#: 101733 Cunill, John
M Defendant Mirabal, Mario

Dockets 103 results returned Table View Select sorting type Select a filter
type Image Din Date Book/Page Docket Entry Event Type Comments
11/07/2025 Calendar Call Hearing 10/14/2025 Motion Calendar Hearing
PLAINTIFF S MOTION TO DECLARE DEFENDANT, MARIO MIRABAL A

VEXATIOUS LITIGANT AND REQUEST FOR SECURITY BOND

10/07/2025 Motion Calendar Hearing Rule to Show Cause

94 09/17/2025 Emergency Motion Event TO STAY PROCEEDINGS, STRIKE
CONFLICTED COUNSEL, AND RECOGNIZE FEDERAL DIVESTITURE

92 09/15/2025 Notice of Hearing- Event October 14, 2025

93 09/10/2025 Motion to Strike Event

91 09/10/2025 Motion: Event Plaintiff's

90 09/09/2025 Notice: Event (Emergency) Judicial Notice of Pending
Motion to Disqualify, Notice of Federal Conflict, and Objection to Rule to
Show Cause Hearing scheduled for October 7, 2025

89 09/09/2025 Emergency Motion Event TO DISQUALIFY JOHN CUNILL AND
THE LAW OFFICES OF ADORNO & CUNILL

88 09/05/2025 Emergency Motion Event TO STAY SANCTIONS ORDER AND
TO PRESERVE DEFENSIVE FILINGS PENDING FEDERAL AND CONSTITUTIONAL
REVIEW

87 09/05/2025 Objection: Event TO ORDER ENTERED AFTER DIVESTITURE
AND DISQUALIFICATION, AND NOTICE OF PENDING SUPREME COURT AND
FEDERAL OVERSIGHT

86 09/04/2025 Order Granting Sanctions Event 84 09/04/2025 Response to
Motion Event

85 09/03/2025 Notice of Filing: Event SUPREME COURT OF FLORIDA
ACKNOWLEDGMENT OF NEW CASE

83 09/02/2025 Response to Motion Event IN OPPOSITION TO DEFENDANT'S
MOTION TO VACATE AND NOTICE OF UNLICENSED PRACTICE OF LAW.

82 09/02/2025 Notice: Event OF ESCALATION TO SUPERVISORY
AUTHORITIES AND RENEWED DEMAND FOR STAY PENDING FEDERAL AND

STATE REVIEW

81 09/01/2025 Notice of Unavailability/absence Event

80 09/01/2025 Emergency Motion Event TO VACATE AND STRIKE VOID ORDERS ENTERED BY DISQUALIFIED JUDGE AND IMPROPER DENIAL OF RECUSAL

79 08/29/2025 Order: Event ON DEFENDANT'S MOTION TO DISQUALIFY

77 08/29/2025 Motion to Disqualify Event

78 08/28/2025 Notice of Taking Deposition Event 08/28/2025 Motion Calendar Hearing PLAINTIFF S MOTION FOR SANCTIONS PURSUANT TO FLA. R. CIV. P. 1.380 76 08/26/2025 Notice: Event Non-appearance

75 08/26/2025 Order: Event PROPOSED- DEFENDANT'S MOTION IS DENIED

74 08/20/2025 Notice: Event OF LACK OF JURISDICTION AND MOTION TO STAY/ABATE

73 08/19/2025 Notice of Hearing- Event August 28, 2025, at 9:00 a.m.

71 07/31/2025 Order: Event DENYING MOTION TO DEEM DISQUALIFICATION GRANTED AND REQUEST FOR STAY

70 07/30/2025 Order Denying Judicial Disqualification Event

69 07/23/2025 Motion for Sanctions Event 68 07/22/2025 Notice: Event of Deemed Grant of Disqualification and Request for Stay Pending Federal and Related Proceedings 72 07/18/2025 Reassignment Pursuant to Administrative Order Event AO number): AO 25-06 67 06/23/2025 Notice of Taking Deposition Event 66 06/22/2025 Request for Hearing Event 65 06/18/2025 Order on Motion to Compel Event 06/18/2025 Motion Calendar Hearing 64 06/17/2025 Request for Hearing Event 63 06/04/2025 Request for Hearing Event 62 05/28/2025 Amended Notice of Hearing Event 6-18-2025 61 05/28/2025 Notice of Hearing- Event June 18, 2025, at 11:15 a.m., via Zoom 60 05/28/2025 Motion to Compel Event 59

05/28/2025 Affidavit in Support of Motion for Judgment Event 58
05/28/2025 Request for Hearing Event 57 05/27/2025 Notice of Taking
Deposition Event 6-10-2025 56 05/26/2025 Request for Hearing Event 55
05/25/2025 Request for Hearing Event Defendant's 54 05/25/2025
Emergency Motion Event to Strike Plaintiffs Second Motion for Summary
Judgment and to Stay All Proceedings Pending Federal Review of Rule 60(d)
(3) Fraud and Sealed Matters and Motion for Hearing 53 05/23/2025
Motion for Summary Judgment Event 52 05/23/2025 Notice: Event OF
FEDERAL FRAUD-BASED MOTION UNDER REVIEW IN ELEVENTH CIRCUIT
UNDER RULE 60(D)(3) FRAUD UPON THE COURT 51 05/21/2025 Exhibit List
Event 50 05/21/2025 Witness List Event 49 05/14/2025 Notice: Event of
Interference with pending Federal Appellate Jurisdiction and Request for
Deferred Action 48 05/11/2025 Notice: Event OF JURSDICTIONAL CONFLICT
47 05/08/2025 Order: Event 3RD DCA ORDER ETC., 46 03/31/2025 Request
for Hearing Event ON SEALED MOTION AND RELATED FILINGS 45
03/29/2025 Letter of Correspondence Event from Mario Mirabal 44
03/28/2025 Notice: Event OF FEDERAL APPEAL TO THE ELEVENTH CIRCUIT
COURT OF APPEALS (Case No. 25-10862 43 03/27/2025 Motion: Event TO
RECALL OR QUASH ANY WRIT OF POSSESSION PENDING APPEAL 42
03/27/2025 Notice: Event OF STAY PENDING APPEAL 41 03/27/2025 Notice:
Event OF FEDERAL PROCEEDINGS AND REQUEST FOR JUDICIAL AWARENESS
39 03/27/2025 34684/4180 Notice of Appeal Event FILED AT THE 3RD DCA
03/27/2025 Motion Calendar Hearing Motion For Default Judgment 38
03/26/2025 Notice of Filing: Event AND DELIVERY CONFIRMATION
REGARDING UNDOCKETED MOTION 37 03/26/2025 Response to Motion
Event TO STAY 36 03/24/2025 Notice: Event OF RECORD OF ORAL
STATEMENT MADE DURING HEARING ON 03-11-2025 35 03/24/2025
Motion for Sanctions Event 40 03/21/2025 Response to Motion Event 32
03/19/2025 Notice: Event OF APPELLATE JURISDICTION AND REQUEST TO
DEFER FURTHER ACTION 31 03/19/2025 Emergency Motion Event TO STAY
MARCH 27, 2025 HEARING AND ALL PROCEEDINGS PENDING APPELLATE
REVIEW 34 03/18/2025 Notice of Hearing- Event March 27, at 9:30 a.m. 33

03/18/2025 Motion for Default Judgment Event 30 03/13/2025 Emergency
Motion Event For Stay Pending Appeal 29 03/12/2025 Order Denying
Motion to Dismiss Event 03/11/2025 Motion Calendar Hearing Mirabal's
mtn to dismiss 28 03/06/2025 Notice of Filing: Event ORDER OF REMAND
25 03/06/2025 Motion: Event To Alert the Court of Clerical Error 27
03/04/2025 Notice of Hearing- Event March 11, at 9:30 a.m. 26 03/04/2025
Motion to Strike Event 24 03/04/2025 Notice of Filing: Event Order of
Remand United States District Court Southern District of Florida 23
03/03/2025 Emergency Motion Event For Stay Pending Emergency
Administrative Review, etc,.. 22 02/18/2025 Notice of Filing: Event Notice
of Removal 21 02/10/2025 Motion to Dismiss Event 20 02/03/2025 Order
Setting Non-Jury Trial with Mediation Referral Event Call of the Calendar on
11-07-2025 at 1pm 19 02/03/2025 Order Denying Motion Event TO
CONSOLIDATE 02/03/2025 Motion Calendar Hearing Motion to Consolidate
18 01/27/2025 Order Setting CM Deadline Event 17 01/02/2025 Motion:
Event TO ALERT THE COURT OF FRAUD, MATERIAL OMISSION, AND
REQUEST FOR JUDICIAL COORDINATION AND RELIEF 16 12/11/2024
Response: Event AND OBJECTION TO DEFENDANT'S MOTION TO
CONSOLIDATE 15 12/11/2024 Notice of Hearing- Event 02-03-2025 @ 11:00
AM 14 12/11/2024 Response to Motion Event 13 12/05/2024 Motion:
Event To Request Consolodation or Trfansfer to Judge Tanya Brinkley 12
12/03/2024 Electronic Summons Email Notification Sent Event John Cunill
11 12/03/2024 Electronic Summons Email Notification Sent Event John
Cunill 12/03/2024 20 Day Summons Issued Service 10 12/03/2024
ESummons 20 Day Issued Event Re: Index # 6. 12/03/2024 20 Day Summons
Issued Service 9 12/03/2024 ESummons 20 Day Issued Event Re: Index # 5.
8 12/03/2024 Receipt: Event Receipt#:3190162 Amt Paid:\$10.00
Name:CUNILL, JOHN M 1000 BRICKELL AVE STE 1100 MIAMI FL 33131-3014
Comment: Allocation Code Quantity Unit Amount 3139-Summons Issue Fee
1 \$10.00 \$10.00 Tender Type:eFilings Tender Amt:\$10.00 Receipt
Date:12/03/2024 Register#:319 Cashier:EFilingUser 7 12/03/2024 Receipt:
Event Receipt#:3190160 Amt Paid:\$10.00 Name:CUNILL, JOHN M 1000

BRICKELL AVE STE 1100 MIAMI FL 33131-3014 Comment: Allocation Code
Quantity Unit Amount 3139-Summons Issue Fee 1 \$10.00 \$10.00 Tender
Type:eFilings Tender Amt:\$10.00 Receipt Date:12/03/2024 Register#:319
Cashier:EFilingUser 6 11/29/2024 (M) 20 Day (P) Summons (Sub) Received
Event 5 11/29/2024 (M) 20 Day (P) Summons (Sub) Received Event 4
11/29/2024 Receipt: Event Receipt#:2110041 Amt Paid:\$401.00
Name:CUNILL, JOHN M 1000 BRICKELL AVE STE 1100 MIAMI FL 33131-3014
Comment: Allocation Code Quantity Unit Amount 3100-Circuit Filing Fee 1
\$401.00 \$401.00 Tender Type:eFilings Tender Amt:\$401.00 Receipt
Date:11/29/2024 Register#:211 Cashier:EFilingUser 2 11/27/2024
Complaint Event 1 11/27/2024 Civil Cover Sheet - Claim Amount Event

EXHIBIT C



mario mirabel <solphax@gmail.com>

Scheduled Zoom Meeting Notification: 2024-022769-CA-01

1 message

cmap-noreply@jud11.flcourts.org <cmap-noreply@jud11.flcourts.org>

Fri, Oct 3, 2025 at 9:44 AM

MAP

Zoom Virtual Hearing Scheduled

The following Virtual Hearing has been scheduled.

Case Number: 2024-022769-CA-01
Category: Motion Calendar
Description: Rule to Show Cause
Hearing Date: 10-07-2025
Hearing Time: 09:30 AM
Presiding Official: Lourdes Simon
Case Style: KP INVESTMENTS MIAMI, LLC a Florida LLC vs Mario Mirabal
Zoom Meeting ID: 91475921065
Zoom Dial-In Number: +1 786-635-1003
Zoom Join URL: <https://zoom.us/j/91475921065>

This is a system generated email. Please do not reply to this message.

The 11th Judicial Circuit serves the citizens of Miami-Dade County Florida. The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

© courtMAP - Eleventh Judicial Circuit of Florida

EXHIBIT D



mario mirabel <solphax@gmail.com>

Notice of Cancelled Court Event: 2024-022769-CA-01

1 message

cmap-noreply@jud11.flcourts.org <cmap-noreply@jud11.flcourts.org>

Mon, Oct 6, 2025 at 9:23 AM

MAP

Notice of Cancelled Court Event

Case Number: 2024-022769-CA-01
Case Style: KP INVESTMENTS MIAMI, LLC a Florida LLC vs Mario Mirabal
Section: CA02
Category: Motion Calendar
Event Date: 10-07-2025
Event Time: 09:30 AM - 10:30 AM
Presiding Official: Lourdes Simon (Judge)
Description: Rule to Show Cause
Scheduled By: John Cunill
Scheduled On: 09-09-2025 01:17 PM
Status: Cancelled
Cancellation Reason: Other
Additional Comments: Pending order on

This is a system generated email. Please do not reply to this message.

The 11th Judicial Circuit serves the citizens of Miami-Dade County Florida. The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

© courtMAP - Eleventh Judicial Circuit of Florida